



Construction Code Interpretation
2021-SMC

CCI 2021-WSR 25-13-051

Enforcement of A2L Refrigerant
Emergency Rule

Release date: August 4, 2025

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The following interpretation is intended to provide guidance to staff for consistency of review and is subject to change without notice. Application of this interpretation to specific projects may vary.

Code Issue:

Is SDCI enforcing the State of Washington A2L Refrigerants emergency rule WSR 25-13-051 (effective February 13, 2025, extended by WSR 25-05-059)? Where the emergency rule conflicts with 2021 SMC, what are the requirements?

Code Interpretation:

Yes, SDCI is enforcing the State of Washington A2L Refrigerants emergency rule in its entirety with a few exceptions.

The emergency rule adopts the following standards and coordinates the standards with the 2021 Washington State Mechanical Code (WSMC):

- ASHRAE 15-2022 Safety Standard for Refrigeration Systems
- ASHRAE 15.2-2022 Safety Standard for Refrigeration Systems in Residential Applications
- ASHRAE 34-2022 Designation and Safety Classification of Refrigerants
- ASHRAE 62.2-2019 Ventilation and Acceptable Indoor Air Quality in Low-Rise Residential Buildings
- UL 60335-2-40-2022 Household and Similar Electrical Appliances - Safety - Part 2-40: Particular Requirements for Electrical Heat Pumps, Air-Conditioners and Dehumidifiers

The majority of the changes are in chapters 2, 5, 11, and 15 of the State of Washington Mechanical code. Some changes correlate with approved Addenda to ASHRAE 15-2022. Many changes support enforcement of ASHRAE 15.2-22 Safety Standard for Refrigeration Systems in Residential Applications.

The City of Seattle locally adopts and amends the 2021 Washington State Mechanical Code (WSMC). The 2021 Seattle Mechanical Code (SMC) went into effect Nov 15, 2024. SDCI will continue to enforce its local amendments for the following sections covered in the State of Washington emergency rule:

- **SMC Section 501.3.1 items 5 and 6** concerning the location of exhaust outlets in enclosed parking garages, loading docks, motor vehicle repair, and transformer vault exhaust system outlets will continue to be enforced using the language adopted in the 2021 SMC, not the State emergency rule. The SMC includes additional amendments which address hazards presented by exhaust outlets in dense urban environments.
- **SMC 501.3.1, item 2, interpretation**
Clarifications provided in the WSMC and recent ASHRAE 15 editions do not classify the A2L or B2L shaft exhaust as product conveying exhaust, therefore the last phrase in the 2021 SMC note crossed out below is no longer being enforced:



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Interpretation: Item 2 includes central vacuum systems, dry cleaner, photo lab, school chemical lab, nail salon, dryer exhaust over 250° source capture system exhaust and combustion engine ((~~exhaust and refrigerant pipe shaft ventilation exhaust outlets covered under Section 1109.3.2 carrying Group A2L and Group B2L refrigerants~~)).

For questions about whether this code solution applies to your project:

- If you have submitted a permit application, contact the Building Code/Mechanical plan reviewer assigned to your application.
- If you have not submitted an application, send us a question through the SDCI website.
<http://www.seattle.gov/sdci/resources/send-us-a-question>.
- Visit the Applicant Services Center website for more information about hours and location.
<https://www.seattle.gov/sdci/about-us/who-we-are/sdci-services>